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November 2, 2020

By ECF

Hon. Kenneth M. Karas  
United States District Judge  
The Hon. Charles L. Brieant Jr. Federal Building and United States Courthouse  
Southern District of New York  
300 Quarropas Street  
White Plains, New York 10601

Re: *Stanley v. Direct Energy Services, LLC*, Case No. 7:19-cv-03759-KMK

Dear Judge Karas:

Pursuant to Your Honor's instructions during the October 28, 2020 Status Conference, we write on behalf of Plaintiff Linda Stanley and Defendant Direct Energy Services, LLC to respectfully request a revised expert disclosure schedule.

The Court's Case Management Plan and Scheduling Order, ECF No. 40, provides that all fact discovery shall be completed by April 6, 2021. In light of the fact discovery deadline, the parties respectfully request that Paragraph 7 of the Court's Order be amended so that all expert disclosures, including reports, production of underlying documents and depositions are to be completed as follow:

All *expert* disclosures, including reports, production of underlying documents and depositions are to be completed by September 6, 2021;

Plaintiff's initial expert disclosures pursuant to Rule 26(a)(2) shall be made by June 14, 2021;

Defendant's expert disclosures pursuant to Rule 26(a)(2) shall be made by July 19, 2021; and

Plaintiff's rebuttal expert disclosures pursuant to Rule 26(a)(2) shall be made by August 16, 2021.

We thank the Court for its continued attention to this matter and its consideration of our request.

Respectfully Submitted,

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